

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KEEDRA JACKSON

Plaintiff,

V.

CITY OF STONECREST, GA,

Defendant.

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) **CIVIL ACTION NO.:**
) **1:23-cv-03498-SDG-JKL**
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JOINT MOTION TO STAY
ALL DEADLINES PENDING MEDIATION

Plaintiff Keedra Jackson and Defendant City of Stonecrest (collectively, “the Parties”), by and through their respective undersigned counsel, and pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Rule 26.2 of the Local Rules of the Northern District of Georgia, hereby request that this Court stay all deadlines pending mediation of this matter. In support of this Motion, the Parties show the Court as follows:

1.

The discovery period in this matter, as extended, closed on April 8, 2024, and the current deadline for dispositive motions is May 10, 2024.

2.

The Parties have, in an effort to amicably resolve this matter, selected a mediator and are seeking to schedule mediation for June 13, 2024, or on such date as can be agreed to shortly thereafter.

3.

The Parties believe that a stay of proceedings is essential to, and will greatly enhance the likelihood of, a successful mediation. The requested stay would enable the Parties to redirect their time and resources toward preparing for mediation and greatly reduce the legal expenses that the Parties would otherwise incur prior to mediation, thereby preserving financial resources for any settlement negotiations. *See, e.g., U.S. Oil & Gas v. Wolfson*, 967 F.2d 489, 493 (11th Cir. 1992) (noting that public policy strongly favors pretrial settlement in all types of litigation because such cases, depending on their complexity, “can occupy a court’s docket for years on end, depleting the resources of parties and the [court]”).

4.

The Parties are optimistic that the mediation will be successful; however, if they are unable to resolve the matter through mediation, the Parties agree to promptly notify the Court within seven (7) days of the unsuccessful mediation and concurrently file a proposed amended scheduling order that proposes, *inter alia*, new deadlines for filing dispositive motions, including motions for summary judgment.

5.

For the foregoing reasons, the Parties respectfully submit that they have demonstrated good cause for the requested stay and related relief. *See, e.g., Patterson v. United States Postal Serv.*, 901 F.2d 927, 929 (11th Cir. 1990) (noting broad discretion of district court to stay pretrial deadlines); *Panola Land Buyers Ass’n v. Shuman*, 762 F.2d 1550, 1560 (11th Cir. 1985) (similar).

6.

Accordingly, the Parties jointly move for the entry of an appropriate Order: (a) staying all deadlines and proceedings in this action until such time as the Parties have had an opportunity to participate in mediation; and (b) requiring the Parties to notify the Court, within seven (7) days of the conclusion of their mediation, should the mediation prove to be unsuccessful, and concurrently file a proposed amended scheduling order which sets forth proposed deadlines for filing dispositive motions, including motions for summary judgment. A Proposed Order granting this Motion is attached for the Court’s convenience and filing.

Respectfully submitted this 7th day of May 2024.

s/ Artur Davis

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CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that this Motion complies with the font and point selection approved by the Court in Local Rule 5.1. This Motion has been prepared in Times New Roman font, 14 point.

s/ *Daniel F. Barrett*

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